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9 **UNITED STATES DISTRICT COURT**

10 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

11 LAMONT TARKINGTON,

12 Plaintiff,

13 vs.

14 COUNTY OF LOS ANGELES; LOS
15 ANGELES COUNTY SHERIFF'S
16 DEPARTMENT; LOS ANGELES
17 COUNTY SHERIFF JIM MCDONNELL;
18 LAUREN BROWN; JAMES MURREN;
19 DONALD YOUNG; LAWRENCE
20 BEACH ALLEN CHOI PC; and DOES 1-
21 10 INCLUSIVE;

22 Defendants.

) Case No.: 2:18-CV-07636-CJC-JC
)
) **PLAINTIFF'S REPLY TO**
) **DEFENDANTS' OPPOSITION TO**
) **MOTION TO ENFORCE**
) **SETTLEMENT AGREEMENT**

)
) Date: July 20, 2020
) Time: 1:30 p.m.
) Ctrm.: 7C
) Judge: Hon. Cormac J. Carney

23 PLEASE TAKE NOTICE that Plaintiff submits the following Reply to
24 Defendants' Opposition to Motion to Enforce Settlement:

25 In its Opposition, Defendants argue that it has worked diligently to finalize the
26 settlement and that the COVID-19 crisis has caused disruptions. Yet, Defendants still is
27 not able to provide a date certain for finalizing the settlement. Furthermore, counsel for
28

1 Defendants do not have personal knowledge of the circumstances for the delay and is
2 therefore in no position to provide reliable excuses for Defendants.

3 In any event, Defendants are and will continue to produce various excuses for its
4 delay in finalizing the settlement at Plaintiff's expense. Plaintiff respectfully requests
5 that the Court Order Defendants to have a person with settlement authority and personal
6 knowledge of the reasons for the settlement delay from the County of Los Angeles to
7 attend any and all hearings and submit weekly updates regarding the status of the
8 settlement and the diligent efforts it is taking to finalize it. Otherwise, Defendants will
9 continue to have unfettered freedom to not take necessary and diligent steps to finalize
10 the settlement at Plaintiff's expense.

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12 Dated: July 6, 2020

By: /s/ Leo James Terrell

13 Leo James Terrell, Esq.
14 Attorneys for Plaintiff,
15 LaMont Tarkington
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